# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

YOUFIT HEALTH CLUBS, LLC, et al.,1

Debtors.

Chapter 11

Case No. 20-12841 (MFW)

(Jointly Administered)

### NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Midlo Properties, LLC ("Midlo") hereby appears in the above-captioned cases through its counsel, Spotts Fain, PC and Ashby & Geddes, P.A., and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 102(1), 342 and 1109(b), requests that all notices given or required to be given in these cases or any related adversary proceeding and all papers served or required to be served in this case be given and served upon:

#### SPOTTS FAIN, PC

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## ASHBY & GEDDES, P.A.

Stacy L. Newman, Esq. 500 Delaware Avenue, 8th Floor P.O. Box 1150 Wilmington, Delaware 19899-1150 Telephone: (302) 654-1888 Facsimile: (302) 654-2067

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**PLEASE TAKE FURTHER NOTICE** that this request for notice and service includes copies of all papers, including, but not limited to, reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements and answering or reply papers filed in these cases or any related adversary proceeding and that such service be by mailing one copy of each, unless

<sup>&</sup>lt;sup>1</sup> The last four digits of YouFit Health Clubs, LLC's tax identification number are 6607. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at www.donlinrecano.com/yfhc. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 1350 E. Newport Center Dr., Suite 110, Deerfield Beach, FL 33442. {01633382;v1}

otherwise directed by the Court, to the parties listed above.

PLEASE TAKE FURTHER NOTICE that Midlo intends that neither this Notice of Appearance nor any former or later pleading, claim or suit shall waive (1) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the "District Court"), (2) the right to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to this case, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or (4) any other rights, claims, actions, defenses, set-offs or recoupments to which Midlo is or may be entitled under agreements, in law or in equity.

Dated: December 3, 2020 ASHBY & GEDDES, P.A.

/s/ Stacy L. Newman

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2

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Counsel to Midlo Properties, LLC

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on the 3rd day of December, 2020, a copy of the Notice of Appearance and Request for Service of Papers was served to all parties of record via CM/ECF.

Dated: December 3, 2020

/s/ Stacy L. Newman Stacy L. Newman, Esq. (DE Bar No. 5044)